

Project team:

Air and Radiation Division

Enforcement and Compliance Assurance Division

Environmental Justice

Ofc Public Affairs

Situation analysis

Region 3 continues to engage in a two-pronged, Agency-wide approach to addressing potential risks posed by EtO which comprises: 1) reviewing CAA regs for facilities that emit EtO, and 2) gathering info on emissions to find reduction opportunities and determine whether more emission reduction steps are needed. Region 3 will first gather information on Tier I facilities (located in PA & WV), then proceed to Tier II facilities (approximately 20 as of last update), sharing information with our state counterparts as we go. Background on risk: This work is based on the results of a National Air Toxics Assessment identifying EtO as a potential health concern that may contribute to potential elevated cancer risks in certain census tracts.

Goals

- *Ensure transparency of EPA efforts through coordination with state/local partners* to share information and when appropriate, relay that information among stakeholders concerning efforts to address risks posed by EtO
- *Increase knowledge and awareness of steps EPA is taking/will take* to address EtO to protect public health
- *Maintain consistency with HQ messages* while adapting messages to R3 stakeholders and target audiences
- *Engage with communities which may be in areas of concern*
- *Be prepared to address and communicate any imminent health risk(s)* should they arise during evaluation process

Communication stakeholders

The following are stakeholders in communicating efforts related to EtO:

- State environmental agencies
- State health agencies
- ATSDR
- EPA and state/local EJ specialists
- Communities and other stakeholder groups in affected areas

Key messages

- Studies indicate breathing air containing elevated levels of EtO for many decades may pose an elevated health risk.
- EPA is working with state/local partners to review federal regulations for facilities that emit EtO to determine whether further action such as emission reductions are needed.
- EPA is committed to sharing information with our state partners so that decisions that best protect public health and the environment can be made.
- EPA is committed to working with state and EJ stakeholders to engage with underserved communities to ensure they have information that empowers them to make decisions that best protects their health and the health of their loved ones.
- EPA Region 3 will take action at any time during this review and information gathering process to immediately ensure public health is protected in the unlikely chance that an imminent threat to public health is discovered.

Communication Strategy

Region 3 will take a three-phased approach to communications that supports a phased *programmatic* approach. Phases are: PHASE 1) Introduce issue to stakeholders and develop baseline knowledge; PHASE 2) Initial Outreach/Increase Baseline Awareness, and PHASE 3) Continued Outreach/Ongoing Engagement:

PHASE I Introduction of Issue/Develop baseline knowledge

(July 2019 - December 2019)

- **Program actions:** Air Division staff to gather, analyze, distribute data and information to state and local partners; discuss options to contact facilities found to have highest modeled risks; coordinate with ECAD staff: inspections; stack testing, Risk Management Plans.
- **Communication actions in support of this phase:** R3 state and local partners are best positioned to contact their respective facilities. However, R3 will suggest key messages for consistency; offer support as needed and keep in communications with state/local partners to determine next appropriate steps.

Proposed, specific actions during this phase:

- o *Develop key messages most appropriate for Phase I*
- o *Partner with state communications POCs to offer support*
- o *Consider development of Community Partners Team*
- o *Monthly check-ins with appropriate stakeholders*

PHASE II Initial Outreach/Increase Awareness

(January 2020 – June 2020)

- **Program actions:** Region 3 to provide assistance as needed to state and local partners as we continue to work down the remaining EtO facilities, while adding more as we find them. We expect that with information learned from Phase I, Second tier facilities should have a more in depth look to confirm that they are indeed a lower risk or determine if their risks have increased. Provide info to S/L. Bring in OAQPS if needed for technical meetings. ECAD will strategize opportunities to identify EtO non-reporters and work with S/Ls enforcement/permit groups.
- **Corresponding communications:** Continue dialog with state and local partners on how they want to inform the local communities. The message to be shared will depend on how the S/L plans to work with their facilities; how the facilities respond; and if there are some ways to reduce exposures.

Proposed actions during this phase:

- o *Develop key messages most appropriate for Phase II*
- o *Intergovernmental outreach*
- o *City council meetings*
- o *Door-to-doors (TBD)*
- o *Program activities will drive communications activities; TBD based on Phase 1.*

PHASE III Continued outreach/Ongoing engagement

(June 2020 – July 2020)

- **Program actions:** Consider which phase in which we conduct NATTS outreach to discuss data with schedule of when we plan to disseminate our R3 S/L--specific data packages, etc.
- **Corresponding communications:** Program activities and Phase I and II communications activities will determine the approach taken for Phase III. TBC.

Proposed actions during this phase may include:

- o *Develop key messages most appropriate for Phase III*
- o *Routine updates with stakeholders involved thus far*
- o *Long-term facility actions*
- o *National long-term regulatory action*